

U.S. BANKRUPTCY COURT
2019 AUG 22 P 2:15
17.

BUGANKO
In Pro Se
930 Truxtun Avenue, Suite 102
Bakersfield, CA 93301
Tel: (661) 327-3337
Fax: (661) 327-3395
Email: saganong@gmail.com

IN AND FOR THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:
HVI CAT CANYON, INC,
Debtor.

Chapter 11
Case No. 19-12417 (MEW)
NOTICE OF JOINDER TO SANTA
BARBARA COUNTY AIR POLLUTION
CONTROL DISTRICT, COUNTY OF SANTA
BARBARA, AND HARRY HAGEN,
TREASURER AND TAX COLLECTORS'
MOTION TO TRANSFER VENUE

The creditor, BUGANKO, a California Limited Partnership, pro se, hereby joins in the MOTION TO TRANSFER VENUE filed by the Santa Barbara County Air Pollution Control District, County of Santa Barbara, and Harry Hagen, Treasurer and Tax Collectors ("Motion") (docket No. 47, filed on 8/14/2019) and set forth the following:

Jurisdiction

1. This joinder adopts and incorporates by reference herein the *Jurisdiction* section set forth in the Motion.

NOTICE OF JOINDER TO SANTA BARBARA COUNTY AIR POLLUTION CONTROL
DISTRICT, COUNTY OF SANTA BARBARA, AND HARRY HAGEN, TREASURER AND TAX
COLLECTORS' MOTION TO TRANSFER VENUE

Facts

2. This Joinder adopts and incorporates by reference herein the *Facts* section.

Discussion

Argument and Authorities

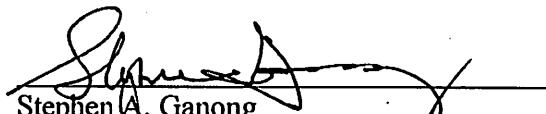
3. This Joinder incorporates and adopts by reference the *Argument and Authorities* as set forth in the Motion.
4. In addition, BUGANKO is a California-domiciled Limited Liability Company whose asset, a mineral interest and surface use rights are located in Southern California and are in the possession of debtor.

WHEREFORE, this Joinder respectfully requests that this Court enter an order:

1. Granting the Motion for Change of Venue to the Central District of California
2. Providing such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

Dated: August 21, 2019



Stephen A. Ganong
Managing Member, Buganko LLC

NOTICE OF JOINDER TO SANTA BARBARA COUNTY AIR POLLUTION CONTROL
DISTRICT, COUNTY OF SANTA BARBARA, AND HARRY HAGEN, TREASURER AND TAX
COLLECTORS' MOTION TO TRANSFER VENUE

CERTIFICATE OF SERVICE

State of California, County of Kern

I am employed in the County of Kern, State of California. I am over the age of 18 years and not a party to this action. I reside in Kern County, State of California.

On 8/21/19, I served the following document(s) described as:

NOTICE OF JOINDER TO SANTA BARBARA COUNTY AIR POLLUTION CONTROL
DISTRICT, COUNTY OF SANTA BARBARA, AND HARRY HAGEN, TREASURER AND TAX
COLLECTORS' MOTION TO TRANSFER VENUE

On 8/21/19, in addition to those parties served electronically by the Court's electronic notification system on August , 2019, I caused the following to be served by email or First Class Mail to those parties listed on the **ATTACHED EXHIBIT A**:

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on August 21, 2019, at Bakersfield, Kern County, California.



Nancy A. Lopes

NOTICE OF JOINDER TO SANTA BARBARA COUNTY AIR POLLUTION CONTROL
DISTRICT, COUNTY OF SANTA BARBARA, AND HARRY HAGEN, TREASURER AND TAX
COLLECTORS' MOTION TO TRANSFER VENUE

United States Bankruptcy Court
Southern District of New York
In re: HVI CAT CANYON, INC., debtor.
Chapter 11, Case No. 19-12417

EXHIBIT A
SERVICE LIST
Page 1 of 2

| PARTY | Counsel | Method of Service |
|----------------------|--|--|
| Debtor | HVI Cat Canyon, Inc. P.O. Box 6030 Santa Maria, CA 93456-6030 Richard E. Weltman Michael L. Mokowitz Debra Kramer Michele K. Jaspan Adrienne Woods Melissa A. Guseynov WELTMAN & MOKOWITZ, LLP 270 Madison Avenue, Suite 1400 New York, NY 10016-0601 | Via First Class Mail Via Email: rew@weltmc.sk.com mlm@weltmosk.com dk@weltmosk.com mkj@weltmosk.com aw@weltmosk.com mag@weltmosk.com |
| Claims Agent | Epiq Corporate Restructuring, LLC | Via Email: rjacobs@ecf.epiqsystems.com |
| CTS Properties, Ltd | Ira S. Greene Locke Lord LLP 200 Vesey Street New York, NY 10281 | Via email: ira.greene@lockelord.com |
| Diamond McCarthy LLP | Allan B. Diamond Sheryl P. Giugliano Diamond McCarthy, LLP 295 Madison Avenue, 27 th Floor New York, NY 10017 | Via Email: sgiugliano@diamondmccarthy.com |
| GIT, Inc. | Peter Calamari QUINN EMANUEL URQUHART@ SULLIVAN LLP 51 Madison Avenue, 22nd Floor New York, NY 10010 Patricia B. Tomasco Devin van der Hahn QUINN EMANUEL URQUHART@ SULLIVAN LLP 711 Louisiana, Suite 500 Houston, TX 77002 | Via Email: petercalamari@quinnemanuel.com pattytomasco@quinnemanuel.com devinvanderhahn@quinnemanuel.com |

United States Bankruptcy Court
Southern District of New York
In re: HVI CAT CANYON, INC., debtor.
Chapter 11, Case No. 19-12417

EXHIBIT A
SERVICE LIST
Page 2 of 2

| PARTY | Counsel | Method of Service |
|---|---|--|
| UBS AG London Branch | Evan M. Jones Brian M. Metcalf Darren L. Patrick O'MELVENY & MYERS LLP 400 South Hope Street, 18 th Floor Los Angeles, CA 90071-2899 Daniel L. Cantor O'MELVENY & MYERS LLP Seven Times Square New York, NY 10036 Jennifer Taylor QUINN EMANUEL URQUHART@ SULLIVAN LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 | Via Email: ejones@omm.com bmetcalf@omm.com dpatrick@omm.com dcantor@omm.com jtaylor@omm.com |
| United States Trustee | Office of the United States Trustee Attn: Serene K. Nakano U.S. Federal Office Building 201 Varick Str., Room 1006 New York, NY 10014 | Via First Class Mail and via email Serene.nakano@usdoj.gov USTPegion02.NYECF@USDOJ.GOV |
| County of Santa Barbara, California; Harry E. Hagen, as Treasurer-Tax Collector of the County of Santa Barbara, California; and Santa Barbara Air Pollution Control District | W. Ross Spence Carolyn Carollo SNOW SPENCE GREEN LLP 2929 Allen Parkway, Suite 2800 Houston, TX 77019 | Via Email: ross@snowspencelaw.com carolyncarollo@snowspencelaw.com |